

RE: NPRM 99-25

Reply Comments to Blair Alper

BACKGROUND: I am a middle-aged white, suburban male who happens to be blind. As I am a keyboard musician by trade, commercial and noncommercial radio are a valuable tool.

This summer I spent some time vacationing in radio markets serving fewer than 50,000 people, located more than 80 miles from the nearest city. Other than some rush-hour programming, area AM stations were dominated by satellite-delivered, syndicated talk shows; their FM counterparts by syndicated music formats programmed 2,000 miles away. My time away from urban America this summer has opened my eyes to the need for LPFM (low-powered FM) stations. It is most apparent that the 1996 Telecommunications Act, allowing megga corporations unlimited access to broadcast properties nationwide, has virtually destroyed local/community radio in many markets. Here are my thoughts on the proposed LPFM service, being filed in response to those of Blair Alper.

1. The proposed LP1000 (1000-watt LPFM class) should be abandoned. Such a license will exaserbate the potential for co-channel interference and integration.

2. The proposed LP100 (100-watt) LPFM license and a 1-10 watt Microradio class (both commercial and noncommercial) will accommodate the need for community radio while minimizing perceived competition for local resources, including but not limited to advertising dollars, listeners and spectrum. I suggest, however, the LP100 class be modified to a 25-100 watt license.

3. An owner of said LPFM station must show proof of primary residency within 50 miles of the proposed transmitter site. Said owner will agree to begin broadcasting on the assigned frequency within 90 days of its assignment, or face possible revocation of said license. No more than 3 stations shall be licensed to one individual or corporation.

4. If licensed as a commercial operation, said LPFM station must limit advertising time to no more than 20% of any broadcast day; at least 50% of that add time shall be allocated for local advertisers.

5. All engineering/construction studies required in the application for an LPFM license shall take no more than six months to process. All fees collected by the Commission connected with said application are to be kept to a minimum, but shall cover processing and administrative costs pertaining to said filing. However, a concerted effort shall be made by the Commission to accommodate the maximum number of applicants. However, the gender, national heritage or disability(s) of such applicant will not be given any special consideration. As stated earlier I am a person with disabilities.

6. Documentation claiming potential co-channel disruption must be based solely on standarized engineering data. Such challenges found to be faulty in nature (or deemed a nuisance) by the Commission shall result in significant fines and all legal costs connected with the challenge being levied against the complainant.

7. An LPFM license shall only be sold or transferred to another individual or corporation meeting the residency requirements above. Corporations and individuals currently owning an existing AM/FM broadcast property shall be barred from LPFM ownership.

8. As proposed in the Alper comments, I'd like the FCC to make provision for An unlicensed, 500-milliwatt-or-less FM broadcast service on the existing 88 to 108 Mhz band. These Special Events stations could provide information of specific interest to the public attending conventions, trade shows, sporting events, community festivals, county fairs, or anyother activity where Part 15 intentional radiating devices cannot effectively serve the public good due to FCC-mandated field strength restrictions. Such very low-powered transmitters should not be subject to as strict co-channel limitations imposed upon Part 15 devices. Such devices should be allowed to transmit into an external antenna, but be required to conform to FCC RF emissions standards.

CONCLUSION: The errors of the 1996 Telecommunications Act must be corrected. The public must be given access to the locally-controlled radio programming we all grew up with. The proposed LPFM service will truly turn the FM broadcast band into the renewable, natural resource it can be.

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